

EXHIBIT 31

1 UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI

3 * * * * *
4 JOSHUA GLASSCOCK * No.
5 * 22-cv-3095-SRB
6 vs. *
7 SIG SAUER, INC. *
8 * * * * *

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10 VIDEOTAPED DEPOSITION OF THOMAS TAYLOR,
11 Deposition taken at 299 Vaughn Street, Portsmouth,
12 New Hampshire, on Thursday, September 12, 2024,
13 commencing at 9:02 a.m.

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17 Court Reporter:
18 Pamela J. Carle, LCR, RPR, CRR
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1 A. Yes.

2 Q. Would it be accurate to say that that
3 customer service order type could also involve
4 sales through Sig's custom works program?

5 A. Yes. I did not take into consideration
6 the term customer service versus custom works, but
7 it could include custom works sales direct to
8 consumers.

9 Q. And, okay, I think you've answered my
10 question. But just so the record is clear, what is
11 custom works?

12 A. Custom works is our sort of our
13 high-end gun department, and we have your
14 build-your-own-gun portion of our website where
15 consumers can go directly on the Sig Sauer website,
16 they can use a configurator to configure a gun,
17 and that gun can be shipped directly to the
18 consumer.

19 Q. Thank you. And now I wanted to just
20 refer you back to Exhibit 3 that you saw earlier
21 today, which was Glasscock 199. It's a letter, To
22 whom it may concern relating Boston Channel 5 WCVB
23 news report that was on the CANSOFCOM incident, do
24 you recall that?

25 A. Yes.

1 Q. Do you recall if CANSOFCOM conducted an
2 investigation on the incident?

3 A. Yes, they did.

4 Q. And do you know what the result of that
5 investigation was?

6 A. Yes, the outcome was that it was user
7 error. And we knew that at the time, which is why
8 we got the CANSOFCOM and asked if we could make a
9 statement. Because they could not make a statement
10 until they conducted their investigation, although
11 they knew at that time it was likely user error.

12 We collaborated with them to make this
13 statement, and a day later followed up with their
14 own statement confirming it was user error.

15 Q. And when you say user error, what do
16 you mean?

17 A. That the gentleman in CANSOFCOM, the
18 Canadian Special Forces, had discharged his gun
19 with his own -- he pulled the trigger.

20 Q. Now I just want to refer you back to
21 Exhibit 4, which was a draft of potential response
22 to the ABC News, Good Morning America and Nightline
23 pieces, do you recall that?

24 A. Yes.

25 Q. And do you recall being asked about the

1 first option for the beginning of your draft

2 response, which referred to ABC News as an antigun
3 media outlet?

4 A. Yes.

5 Q. Did you ultimately watch the final Good
6 Morning America segment?

7 A. I did.

8 Q. Did you also watch the Nightline
9 segment?

10 A. I did.

11 Q. And based on the segments that were
12 aired, did you conclude whether it was biased?

13 A. We felt it was very biased, because in
14 the Good Morning America piece ABC News -- ABC
15 News' own gun expert opined that he didn't feel
16 like the gun could go off by itself. And he went
17 on to say that the only reason he could suggest
18 that the gun allegedly went off by itself was
19 something that he termed legal momentum, and, you
20 know, obviously he was just saying that lawyers
21 have perpetuated the story that the gun can go off
22 by itself is what he was referring to.

23 When we watched that we were surprised
24 that he said that, but when we watched the
25 Nightline piece a little later in the day or a lot

1 later in the day, ABC News had edited the expert's
2 comments out of the piece, omitting -- omitting
3 that he said the gun likely couldn't go off by
4 itself and that the reason for alleged discharge
5 was legal momentum.

6 So they edited that piece out, so that
7 led us to being -- believing that it was biased
8 because they changed their story based on the later
9 understanding that that was not working in their
10 favor.

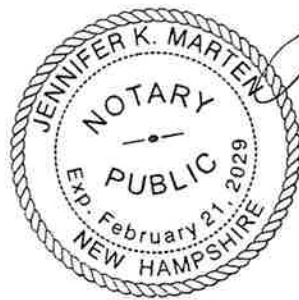
11 Q. And are there any other articles or
12 media that we've discussed today in the deposition
13 where you felt that the media organization didn't
14 incorporate facts that you presented as part of
15 your discussions with that organization?

16 A. I think the most egregious situation
17 was the Washington Post/Trace story where we really
18 decided to go all in and provide as much
19 information as we possibly could, you know, pages
20 of information.

21 And essentially they chose to either
22 ignore it or even edit video footage that we had
23 sent them to try to tell their story the way they
24 wanted to tell it.

25 And, you know, it was quite frustrating

1 I, Thomas Taylor , have read this deposition
2 transcript, and acknowledge herein its accuracy
3 except as noted on the errata sheet.
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Jennifer K. Marten
Signature

Notary Public

21 In Re: Joshua Glasscock v Sig
22 Sauer Inc
23 Witness: Thomas Taylor
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